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January 13, 2015

**VIA ECF**

The Honorable Justice Lorna G. Schofield  
United States District Court  
Southern District of New York  
40 Foley Square – Room 1106  
New York, NY 10007

**Re: Sea Trade Maritime Corp. v. Coutsodontis, et al. (Index No. 09 Civ. 488 (LGS) (HBP)),  
Request for Extension of Time to File Summary Judgment Responses**

Dear Judge Schofield:

We are counsel to Plaintiffs Sea Trade Maritime Corporation and George Peters in the above referenced action. We write to request a brief extension of time from January 19, 2015 until February 9, 2015 to file Plaintiffs' oppositions to Defendants' motions for summary judgment. The basis of our request is: (i) Judge Pitman's recently scheduled January 21, 2015 discovery conference to address outstanding discovery issues; (ii) our pending request to Judge Pitman to recommend a default judgment against Defendants Stelios Coutsodontis and Francesca Coutsodontis (the "Coutsodontis Defendants") for their willful failure to comply with their discovery obligations, or in the alternative, to order an adverse inference instruction; and (iii) the Coutsodontis Defendants' obligation to produce documents which are still outstanding and responsive to our document requests. As previously stated in our correspondence with this Court, these issues are crucial to Plaintiffs' responses to Defendants' motions for summary judgment.

This is Plaintiffs' second request for an extension of time on this matter. On December 4, 2014, this Court granted our first request for an extension.

Yesterday, after receiving notice from Judge Pitman of the January 21, 2015 conference, we inquired whether Defendants consented to this request. We have not yet received a response.

Respectfully submitted,

/s/ Jason H. Berland  
Jason H. Berland  
Counsel for Plaintiffs

cc: John Poles, Esq. (via ECF)  
Christ Stratakis, Esq. (via ECF)  
Peter Skoufalos, Esq. (via ECF)